



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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December 17, 2001

Chuck Semborski, Environmental Supervisor
Energy West Mining Company
P.O. Box 310
Huntington, Utah 84528

Re: Conditional Approval of Surface Facility Map, PacifiCorp, Cottonwood/Wilberg Mine,
C/015/019-AM01C, Outgoing File

Dear Mr. Semborski:

The above-referenced amendment is conditionally approved upon receipt of three clean copies prepared for incorporation. Please submit these copies by January 14, 2002. Once we receive these copies, final approval will be granted, at which time you may proceed with your plans.

A stamped incorporated copy of the approved plans will also be returned to you at that time, for insertion into your copy of the Mining and Reclamation Plan. A copy of our Technical Analysis is enclosed.

If you have any questions, please call me at (801) 538-5268 or Jim at (801) 538-5262.

Sincerely,

A handwritten signature in cursive script, reading 'Pamela Grubaugh-Littig'.

Pamela Grubaugh-Littig
Permit Supervisor

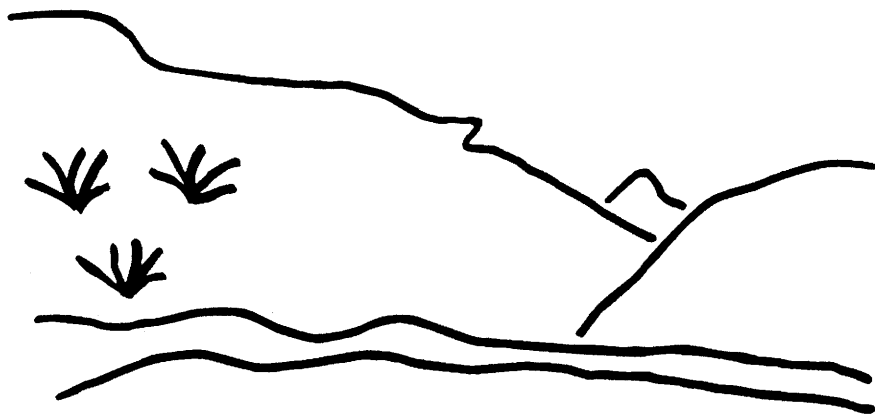
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Enclosure

cc: Price Field Office

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State of Utah



Utah Oil Gas and Mining

Coal Regulatory Program

Cottonwood/ Wilberg Mine
Surface Facility Map
C/015/019-AM01C
Technical Analysis
December 17, 2001

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INTRODUCTION

TECHNICAL ANALYSIS

INTRODUCTION

Besides being adjacent to each other, the Cottonwood/Wilberg and Trail Mountain Mines have been linked through the Belt Portal Tunnel and the Diesel Roadway Portal (the Trail Mountain Access tunnel or TMA). From the Belt Portal Tunnel, the Cottonwood/Wilberg conveyor system transported Trail Mountain coal through East Mountain to the truck load-out at the Cottonwood Mine main facilities area. The TMA allowed direct vehicle access between the mine and the Trail Canyon surface facilities, by way of Emery County Road 506 in Cottonwood Canyon.

Energy West submitted a notice of Temporary Cessation of Operations for the Trail Mountain, Cottonwood, and Wilberg Mines to the BLM on February 8, 2001. A letter specifically addressing closure of the Cottonwood/Wilberg Mine was sent to the Division May 22, 2001 (received May 24)

Proposed amendment C/015/019 AM01C is for modification of Map 3-13 to show removal of silt fences along ditch DD-4 and removal of two of the three silt fences in the unnamed ditch along the east side of the county road, addition of the buried six-inch pvc drain pipe from the TMA portal seal to the drop inlet that reports to Cottonwood Creek, and the weir and valve assembly in that pvc pipe.

Utah Coal Mining Rules require a coal mine operator to demonstrate steps to be taken to minimize disturbance to the hydrologic balance within the permit and adjacent areas and to prevent material damage outside the permit area. The following is an technical analysis by UDOGM of probable impacts from removal of these silt fences and installation of the PVC pipe.

The proposed changes in the reclamation plan indicated by the changes to Map 3-13 are adequate to minimize disturbance to the hydrologic balance within the permit and adjacent areas and to prevent material damage outside the permit area. However, Map 3-13 and Map 5-5 do not provide clear information on the status of several other ditches and culverts that are described in the text and shown on other maps as being part of the drainage control for the Cottonwood Fan Portal area.

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December 17, 2001

INTRODUCTION

RECLAMATION PLAN

RECLAMATION PLAN

MINE OPENINGS

Regulatory Reference: 30 CFR 817.13, 817.14, 817.15; R645-301-513, -301-529, -301-551, -301-631, -301-748, -301-765, -301-748.

Minimum Regulatory Requirements:

Each exploration hole, other drillhole or borehole, shaft, well, or other exposed underground opening shall be cased, lined, or otherwise managed as approved by the Division to prevent acid or other toxic drainage from entering ground and surface waters, to minimize disturbance to the prevailing hydrologic balance and to ensure the safety of people, livestock, fish and wildlife, and machinery in the permit area and adjacent area. Each exploration hole, drill hole or borehole or well that is uncovered or exposed by mining activities within the permit area shall be permanently closed, unless approved for water monitoring or otherwise managed in a manner approved by the Division. Use of a drilled hole or monitoring well as a water well must meet the provisions required to protect the hydrologic balance. This section does not apply to holes drilled and used for blasting, in the area affected by surface operations.

Each mine entry which is temporarily inactive, but has a further projected useful service under the approved permit application, shall be protected by barricades or other covering devices, fenced, and posted with signs, to prevent access into the entry and to identify the hazardous nature of the opening. These devices shall be periodically inspected and maintained in good operating condition by the person who conducts the underground mining activities.

Each exploration hole, other drill hole or borehole, shaft, well, and other exposed underground opening which has been identified in the approved permit application for use to return underground development waste, coal processing waste or water to underground workings, or to be used to monitor ground water conditions, shall be temporarily sealed until actual use.

When no longer needed for monitoring or other use approved by the Division upon a finding of no adverse environmental or health and safety effects, or unless approved for transfer as a water well, each shaft, drift, adit, tunnel, exploratory hole, entry way or other opening to the surface from underground shall be capped, sealed, backfilled, or otherwise properly managed, as required by the Division and consistent with the requirements of 30 CFR Section 75.1711. Permanent closure measures shall be designed to prevent access to the mine workings by people, livestock, fish and wildlife, machinery and to keep acid or other toxic drainage from entering ground or surface waters.

Analysis:

During temporary cessation the Trail Mountain Access tunnel is designated as a drain, and the Utah Division of Water Quality approved moving the outfall for UPDES 0022896 001 from Grimes Wash to the Trail Mountain Access tunnel in Cottonwood Canyon on July 30, 2001. A 6-inch drain was installed in the seal of the TMA to release water from the mine, rather than have the water accumulate behind the seal, and a six-inch pvc pipe buried to carry any mine discharge to Cottonwood Creek.

A mine seal was also constructed inside the Belt Portal Tunnel to complete sealing of this area of the mine. No mine water discharge occurs at this location.

Locations of the seals and six-inch pipe are shown on Plate 3-13.

Findings:

Mine Openings Reclamation Information is considered adequate to meet the requirements

of this section.

HYDROLOGIC INFORMATION

Regulatory Reference: 30 CFR 784.14, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-301-512, -301-513, -301-514, -301-515, -301-532, -301-533, -301-542, -301-723, -301-724, -301-725, -301-726, -301-728, -301-729, -301-731, -301-733, -301-742, -301-743, -301-750, -301-751, -301-760, -301-761.

Minimum Regulatory Requirements:

Hydrologic reclamation plan

The application shall include a plan, with maps and descriptions, indicating how the relevant regulatory requirements will be met. The plan shall be specific to the local hydrologic conditions. It shall contain the steps to be taken during mining and reclamation through bond release to minimize disturbance to the hydrologic balance within the permit and adjacent areas; to prevent material damage outside the permit area; and to meet applicable Federal and State water quality laws and regulations. The plan shall include the measures to be taken to: avoid acid or toxic drainage; prevent, to the extent possible using the best technology currently available, additional contributions of suspended solids to streamflow; provide water treatment facilities when needed; and control drainage. The plan shall specifically address any potential adverse hydrologic consequences identified in the PHC determination and shall include preventive and remedial measures.

Each application shall contain descriptions, including maps and cross sections, of stream channel diversions and other diversions to be constructed within the proposed permit area to achieve compliance with the performance standards for those structures.

Postmining rehabilitation of sedimentation ponds, diversions, impoundments, and treatment facilities

Before abandoning a permit area or seeking bond release, the operator shall ensure that all temporary structures are removed and reclaimed, and that all permanent sedimentation ponds, diversions, impoundments, and treatment facilities meet the requirements of this Chapter for permanent structures, have been maintained properly and meet the requirements of the approved reclamation plan for permanent structures and impoundments. The operator shall renovate such structures if necessary to meet the requirements of this Chapter and to conform to the approved reclamation plan.

Analysis:

Gravity Discharges

During temporary cessation the Trail Mountain Access tunnel is designated as a drain, and the Utah Division of Water Quality approved moving the outfall for UPDES 0022896 001 from Grimes Wash to the Access Tunnel in Cottonwood Canyon on July 20, 2001. A 6-inch drain was installed in the seal of the TMA to release water from the mine, rather than have the water accumulate behind the seal, and a six-inch pvc pipe buried to carry any mine discharge to Cottonwood Creek.

Diversions

A buried six-inch pvc pipe carries the discharge from the TMA portal-seal drain to the drop inlet to Cottonwood Creek. A shutoff valve assembly and a weir are included in the pipe system. This pipe does not carry storm runoff so it is not required to meet design criteria of the rules. The amount of flow has been estimated by the operator and the six-inch pipe determined to be adequate to carry anticipated flow.

RECLAMATION PLAN

Although ditch DD-4 was originally designed as a temporary diversion, it is now planned to retain it and UD-3 as permanent diversions to prevent disturbance of the steep-slope reclamation in the area revegetated in 1981 (page 25). Ditch UD-3 is simply identified as "undisturbed ditch" on Plate 3-13. The MRP states on page 25 of the Hydrology Section that there is additional information on the status of ditch DD-4 included as an attachment at the end of the section; no attachment and no additional information could be located at the end of the Hydrology Section nor in Appendix A of that section.

Sediment Control Measures

Four sediment fences (silt fences) are proposed for removal from ditch DD-4, which crosses area reclaimed in 1998. DD-4 reports to a sedimentation pond, so removal of these fences should not result in additional sedimentation of Cottonwood Creek or other off-site impacts.

A ditch along the east side of Emery County Road 506 in Cottonwood Canyon carries runoff from the road and also disturbed runoff from the mine's subsoil pile. Runoff then reaches Cottonwood Creek through a drop inlet at the end of the ditch. Mine vehicles and other equipment have routinely crossed the road in going between the TMA and the Trail Mountain Mine surface facilities, and sediment that falls from the vehicles onto the road makes its way to the ditch. Utah Coal Mining Rules do not require the operator to treat runoff from roads. Use of the road as a crossing and the resulting sediment on the road from this traffic have been greatly reduced because of mining cessation. The operator installed and currently maintains three silt fences in the ditch to trap sediment before it reaches the drop inlet and Cottonwood Creek. Two of the three sediment fences are proposed for removal. The remaining silt fence, just up gradient from the drop inlet, should be sufficient to handle sediment from the subsoil pile: discharge from the drain in the TMA portal seal will not flow in the ditch nor be treated by the remaining silt fence.

Sedimentation Ponds

Energy West is planning on reclaiming the sedimentation pond south of the Old Johnson Mine in 2002. This pond is where drainage from DD-4 reports. Because of this pond, removal of the silt fences in DD-4 should not result in any added sediment in Cottonwood Creek.

Findings:

Hydrologic Reclamation Information is considered adequate to meet the requirements of this section.

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